

DIRECT DIAL NUMBER:
(215) 575-7122

Gregory F. Cirillo
gcirillo@dilworthlaw.com

August 30, 2017

VIA E-MAIL AND FIRST CLASS MAIL

Magistrate Judge Martin C. Carlson
Ronald Reagan Federal Bldg. & U.S. Courthouse
228 Walnut Street
Harrisburg, PA 17108-0983
Magistrate_judge_carlson@pamd.uscourts.gov

**Re: *Julie Ellen Wartluft f/k/a Julie Ellen Bartels and Frederick L. Bartels, Jr.,
Individually and as Administrators of the Estate of Abrielle Kira Bartels,
Deceased v. The Milton Hershey School, et al.***
Civil Action No. 1:16-cv-02145-CCC (M.D. Pa.)

Dear Judge Carlson:

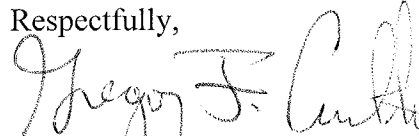
Our Firm represents Plaintiffs in the above-referenced matter. We are in receipt of correspondence dated August 30, 2017 with a proposed Order concerning Third-Party Subpoenas served upon Pinnacle Health and Leslie P. Davis, LPC. Our law Firm was not privy to any discussions with regard to the Stipulated Order between John DeLorenzo, Esquire representing Pinnacle Health and Leslie Davis, LPC and counsel for the Milton Hershey School.

We do not have any objection to records related to Abby Bartel's treatment being provided. However, to the extent that Defendants are seeking confidential treatment records from other individuals besides Abby Bartel's including but not limited to Julie Bartels, Frederick Bartels, Jr., and/or Karen Fitzpatrick those records are confidential protected health information that require additional protections and likely are not even relevant in the instant matter.

The proposed Order as provided to Your Honor is not clear as to the scope of information to be produced.

We are available to discuss this matter at Your Honor's convenience.

Respectfully,

A handwritten signature in cursive script, appearing to read "Gregory F. Cirillo".

Gregory F. Cirillo

GFC/tlv

Enclosure

cc: (via e-mail)

Jarad W. Handelman, Esquire

Kyle M. Elliott, Esquire

John DeLorenzo, Esquire

Kevin J. Neary, Esquire

John J. Higson, Esquire